

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of Texas**

United States Courts  
Southern District of Texas  
FILED

*February 13, 2025*

United States of America

v.

)  
)  
)

Case No.

Nathan Ochsner, Clerk of Court

Cruz Isidro SANDOVAL-LOPEZ  
0/01985

)  
)  
)

**4:25-mj-0077**

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 9, 2024 through February 12, 2025 in the county of Harris and Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

*Offense Description*

21 USC 841

Possession with intent to distribute over 500 grams of  
methamphetamine, a Schedule II controlled Substance

21 USC 846

Conspiracy to Possess with intent to distribute over 500 grams of  
methamphetamine, a Schedule II controlled Substance

This criminal complaint is based on these facts:

See Attachment A

Continued on the attached sheet.

Approved by AUSA Patricia Profit

  

*D.B.*  
Complainant's signature

**Daniel Banda, DEA Task Force Officer**

*Daniel Banda*  
Printed name and title

Sworn to before me and signed in my presence.  
 Sworn to telephonically and signed electronically per  
Fed.R.Cr.4.1

Date: February 13, 2025

  

*Peter Bray*  
Judge's signature

City and state: Houston, Texas

**Peter Bray, United States Magistrate Judge**

*Peter Bray*  
Printed name and title

**4:25-mj-0077**

ATTACHMENT A

In February 2025, DEA Agents received information from a Confidential Source (CS) that Cruz SANDOVAL-Lopez was in possession of a large quantity of methamphetamine. Agents were familiar with SANDOVAL-Lopez and his associate, Gerson LOPEZ as Agents had previously seized 13 kilograms of methamphetamine from SANDOVAL-Lopez and LOPEZ in Houston, Texas in December 2024. Both SANDOVAL-Lopez and LOPEZ were later determined by Immigration Customs Enforcement as being illegally present within the United States.

Accordingly, on February 12, 2025 Agents along with Liberty County Sheriff's Office deputies established surveillance of SANDOVAL-Lopez's residence in Cleveland, Texas. While conducting surveillance, Agents observed SANDOVAL-Lopez and LOPEZ enter a white van and begin circling the block, indicative of counter surveillance based on Agent's training and experience. After some time, SANDOVAL-Lopez and LOPEZ were observed departing the residence again, at which point a traffic stop was conducted on SANDOVAL-Lopez and LOPEZ. LOPEZ was the driver of the vehicle and upon conducting a frisk of LOPEZ, he was determined to be in possession of a loaded firearm.

Both LOPEZ and SANDOVAL-Lopez were detained and advised of their Rights in the Spanish language. SANDOVAL-Lopez informed Agents that he had approximately 200 kilograms of methamphetamine at his residence and provided written consent for Agents to search his residence. SANDOVAL-Lopez informed Agents he had already delivered some kilograms of methamphetamine and the 200 was what was remaining.

Upon Agents conducting the consent search, they seized 156 bundles of methamphetamine weighing approximately 160 kilograms. The bundles were comingled with lettuce within several cardboard boxes. Agents observed the shipping label on the outside of the box to indicate the shipment originated from McAllen, Texas.



Daniel Banda  
Task Force Officer  
Drug Enforcement Administration

Signed and sworn telephonically before me on February 27, 2025 and I find probable cause.



Peter Bray  
United States Magistrate Judge